

# ALSTON & BIRD

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February 8, 2021

**VIA CM/ECF**

The Honorable Steven I. Locke  
United States District Court for the Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Signify North America Corporation et al., v. Satco Products, Inc.*, Case No.  
2:19-cv-06125-JMA-SIL

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Dear Judge Locke:

In advance of the status conference scheduled for February 10, 2021, Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively, “Signify”) respectfully submit this letter regarding the status of the parties’ royalty-related discovery, including regarding the Gala system.

As discussed at the December 16, 2020 hearing and as ordered by the Court, Signify produced two spreadsheets on January 19, 2021. Namely, Signify produced a “License Revenue” spreadsheet and an “Invoice List” spreadsheet, reflecting the “first two categories of information as described on the record” at the December 16 hearing. *See* Dkt. 114.

On February 4, Defendant Satco Products, Inc. (“Satco”) requested further information on the “License Revenue” and “Invoice List” spreadsheets produced on January 19 and notified Signify that, based on the produced spreadsheets, as well as the additional requested information, Satco expected to be able to narrow its future discovery requests to focus on a smaller set of licensees. Signify promptly obtained the requested information and responded to Satco on February 6. On February 8, Satco responded to Signify, clarifying certain questions regarding the produced spreadsheets.

The parties continue to work together to significantly narrow the number of licensees for which information is sought pursuant to the “third category of information” as described at the December 16 hearing. *See* Dkt. 114.

/s/Thomas W. Davison

Thomas W. Davison (admitted pro hac vice)

*Counsel for Plaintiffs Signify North America  
Corporation and Signify Holding B.V.*